

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

JAMES QUINN, Derivatively on Behalf of  
Nominal Defendant APPLE REIT TEN, INC.,

Plaintiff,

v.

GLADE M. KNIGHT, JUSTIN KNIGHT,  
KENT W. COLTON, R. GARNETT HALL,  
JR., DAVID J. ADAMS, ANTHONY F.  
KEATING III, DAVID BUCKLEY,  
KRISTIAN GATHRIGHT, DAVID  
MCKENNEY, BRYAN PEERY, and APPLE  
HOSPITALITY REIT, INC.,

Defendants,

and

APPLE REIT TEN, INC.,

Nominal Defendant.

Case No. 3:16-cv-00610-JAG

**PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS' FEES  
AND PAYMENT OF LITIGATION EXPENSES AND TO APPROVE  
PLAINTIFF'S CASE CONTRIBUTION AWARD**

Plaintiff James Quinn ("Plaintiff"), by his undersigned counsel, respectfully moves this Court for an Order, in the form attached hereto as Exhibit A, approving Plaintiff's Counsel's motion for an award of attorneys' fees and payment of litigation expenses and to approve plaintiff's case contribution award. The grounds for this Motion, which is unopposed, are set forth in the accompanying memorandum of law filed simultaneously herewith, Declaration of Robin Winchester in Support of Plaintiff's Motions for Final Approval of the Settlement and for Award of Attorneys' Fees and Payment of Litigation Expenses and to Approve Plaintiff's Case Contribution Award, the Declaration of Wyatt B. Durette, Jr. on the Reasonableness of

Attorneys' Fees and Expenses, and the Affidavit of James Quinn in Support of Plaintiff's Request for Case Contribution Award.

WHEREFORE, Plaintiff's Motion should be granted, and the Court should enter an Order in the form attached hereto.

Dated: February 22, 2016

**WILLIAMS & SKILLING, P.C.**

/s/ Charles Williams

Charles Williams (VA Bar #: 23587)  
cwilliams@williamsandskilling.com  
4801 Radford Avenue, Suite A  
Richmond, VA 23230  
Telephone: (804) 447-0307  
Facsimile: (804) 447-0367

**KESSLER TOPAZ  
MELTZER & CHECK, LLP**

Lee Rudy  
Robin Winchester  
Geoffrey C. Jarvis  
Matthew L. Mustokoff  
Joshua A. Materese  
Grant D. Goodhart  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: (610) 667-7706  
Facsimile: (267) 948-2512  
Email: lrudy@ktmc.com  
rwinchester@ktmc.com  
gjarvis@ktmc.com  
mmustokoff@ktmc.com  
jmaterese@ktmc.com  
ggoodhart@ktmc.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on February 22, 2016, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

**WILLIAMS & SKILLING, P.C.**

/s/ Charles Williams

Charles Williams (VA Bar #: 23587)

4801 Radford Avenue, Suite A

Richmond, VA 23230

Telephone: (804) 447-0307

Facsimile: (804) 447-0367

Email: cwilliams@williamsandskilling.com